

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

FIRSTENERGY CORP.,	)	CASE NO.: CASENUMBER
	)	
and	)	JUDGE: JUDGENAME
	)	
CLEARSLULTING LLC,	)	
	)	
PLAINTIFFS,	)	<b>MOTION FOR TEMPORARY</b>
vs.	)	<b>RESTRAINING ORDER AND</b>
	)	<b>PRELIMINARY INJUNCTION</b>
MICHAEL PIRCIO,	)	
	)	
DEFENDANT.	)	

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs FirstEnergy Corp. (“FirstEnergy”) and Clearsulting LLC (“Clearsulting”) (collectively, the “Plaintiffs”), moves this Court for the issuance of a Temporary Restraining Order and Preliminary Injunction against Defendant Michael Pircio (“Pircio”).

As detailed in the Complaint and the accompanying Memorandum in Support, after Clearsulting terminated Pircio’s employment, Pircio unlawfully accessed Clearsulting’s computer, without authorization, and downloaded FirstEnergy’s proprietary and confidential information from an internet-based SharePoint site, in violation of the Computer Fraud and Abuse Act, his Employment Agreement, the Defend Trade Secrets Act, and the Ohio Uniform Trade Secret Act. If Pircio is not immediately enjoined from further disseminating that information, Plaintiffs will suffer irreparable harm.

Accordingly, the Plaintiffs hereby request that this Court grant a temporary restraining order and preliminary and permanent injunctions prohibiting the further use or disclosure by Pircio

of FirstEnergy's trade secret, proprietary, and confidential information and return of all copies of such information in his possession.

This Motion is supported by Plaintiffs' Complaint with its supporting exhibits and the accompanying Memorandum in Support, which is incorporated herein by reference.

Respectfully submitted,

*s/ Gregory J. Phillips*

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